

EXHIBIT J

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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March 11, 2021

Via Email Only

Wills Law Firm, PLLC

Attn: Rhonda H. Wills, Esq.

Patrick Raspino, Esq.

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Houston, TX 77056

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Re: *The Pullman Group, LLC v. Isley et al*
Case No.: 1:20-cv-07293-GHW

Dear Ms. Wills and Mr. Raspino:

As you know, this firm serves as litigation counsel to Plaintiff The Pullman Group, LLC (the “Plaintiff”). On behalf of our client, we write to address you with respect to the following urgent matter.

On December 22, 2020, the undersigned law firm, on behalf of Plaintiff, served your office with, *inter alia*:

1. Plaintiff’s First Request for the Production of Documents; and
2. Plaintiff’s First Set of Interrogatories (“Plaintiff’s Interrogatories”, and together, “Plaintiff’s First Set of Discovery Requests”).

We are in receipt of your clients, the Isley Defendants’¹ supplemental response, dated March 1, 2021, in response to Plaintiff’s First Set of Discovery Requests.

The Isley Defendants’ March 1, 2021 supplemental responses are deficient for the very same reasons detailed in Plaintiff’s deficiency letter dated February 16, 2021. Despite the passage of another month, the Isley Defendants have not produced a single document since Plaintiff’s First Set of Discovery Requests were served on December 22, 2020.

As previously explained to you in our email dated March 2, 2021 and during our meet and confer held on March 8, 2021, the Isley Defendants’ objection to virtually every single request in Plaintiff’s First Set of Discovery Requests is groundless and meritless. We urge you to reconsider your obstructionist conduct before the Court conference scheduled for March 17, 2021.

¹ The “Isley Defendants” refer to Defendants Ronald Isley (“Ronald”), Rudolph Isley (“Rudolph”), The Estate of O’Kelly Isley, J.R. (the “O’Kelly Estate”), Isley Brothers, L.L.C. (“Isley Brothers LLC”), Isley Brothers Royalty Venture I SPC, Inc. (“Royalty Venture”), Three Boys Music Corporation (“Three Boys”), Bovina Music Inc. (“Bovina”), T-Neck Records, Inc. (“T-Neck”), and Triple Three Music, Inc. (“Triple Three”).

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein
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